

**BellSouth Corporation**  
Suite 900  
1133-21st Street, N.W.  
Washington, DC 20036-3351

kathleen.levitz@bellsouth.com

**Kathleen B. Levitz**  
Vice President-Federal Regulatory

202 463 4113  
Fax 202 463 4198

August 9, 2002

Ms Marlene H. Dortch  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: WC Docket No. 02-150

Dear Ms Dortch:

This is to inform you that on August 9, 2002, Ernest Bush, Jon Banks, and I had a telephone conversation with Aaron Goldberger and Greg Cooke. The purpose of the call was to reiterate BellSouth's commitment to adhering fully to the processes and procedures of the regional Change Control Process, or CCP. Mr. Bush stated that in written response to questions also filed on August 9 BellSouth would discuss the steps it is undertaking internally to assure the quality of software releases that are CLEC affecting. Mr. Bush also described six additional performance measures related to the change control recently adopted by the Florida Public Service Commission (FPSC).<sup>1</sup> He said that BellSouth would be filing letters with the public service commissions of the following states: Alabama; Kentucky; Louisiana; Mississippi; North Carolina; South Carolina; and Tennessee stating that starting with August 2002 performance data, BellSouth will report the regional data collected in accordance with these six measures in each of its state monthly performance reports. Those letters were filed on August 9, 2002 and, at the FCC staff's request, are attached to this letter.

Mr. Bush noted that the FPSC has also ordered BellSouth to include three of the new metrics among the metrics in its performance assurance plan for which sustained lack of parity requires BellSouth to pay "Tier 2" penalties. He said that each of the previously mentioned letters to the seven state commissions stated that BellSouth would begin voluntarily to pay Tier 2 penalties on these three

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<sup>1</sup> Copies of these metrics, CM-6, MM-7, CM-8, CM-9, CM-10, and CM-11, appear in each of the attachments to this letter described below.

metrics to that state as well as to the FPSC. At the same time BellSouth asked each of the seven state commissions to amend that state's performance plan to incorporate the six measures and associated penalties

In Georgia, the Georgia Public Service Commission is currently in the midst of its six-month review of BellSouth's Service Quality Measurement ("SQM"). During the industry workshops conducted as part of this process, BellSouth agreed to include measures CM-6, CM-7, and CM-8 in the Georgia SQM. On August 8, 2002, the Georgia Public Service Commission Staff issued its recommendation in which it recommended that CM-9 and CM-11, as adopted by the FPSC, also be added to the SQM in Georgia. BellSouth does not object to this recommendation, and, in its comments to be filed with the Georgia Commission on August 16, 2002, BellSouth will ask that measure CM-10 be included in the Georgia SQM as well and that measures CM-6, CM-7 and CM-11 be added to the Georgia Self-Effectuating Enforcement Mechanism ("SEEM") plan.

In accordance with Section 1.1206, I am filing two copies of this and request that you place it in the record of the proceeding identified above. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Kathleen B. Levitz". The signature is written in a cursive, flowing style.

Kathleen B. Levitz

Attachment

cc: Aaron Goldberger  
Michelle Carey  
Gina Spade  
Susan Pié  
James Davis-Smith



Post Office Box 752  
Columbia, South Carolina 29202-0752  
Telephone: 803/401-2900  
Fax: 803/254-1731  
E-mail: caroline.watson@bellsouth.com  
IPager: cwatson2@imcingular.com

**Caroline N. Watson**  
General Counsel - South Carolina

Street Address:  
1600 Williams Street, Suite 5200  
Columbia, South Carolina 29201

August 9, 2002

The Honorable Gary E. Walsh  
Executive Director  
Public Service Commission of SC  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc.  
to Provide In-Region InterLATA Services Pursuant  
to Section 271 of the Telecommunications Act of  
1996  
Docket No. 2001-209-C

Dear Mr. Walsh:

Recently, the Florida Public Service Commission  
adopted 6 additional change control measures. These  
measures are as follows:

- CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days
- CM-7: Percent of Change Requests Accepted or Rejected Within 10 Days'
- CM-8: Percent of Change Requests Rejected
- CM-9: Number of Defects in Production Releases (Type 6 CR)
- CM-10: Software Validation

- CM-11: Percent of Change Requests Implemented Within 60 Weeks of Prioritization<sup>1</sup>

Copies of the SQM pages for these measures are attached to this letter.

As the Commission is aware, several state commissions and the FCC have focused attention on BellSouth's CCP process. Consequently, BellSouth will report regional data collected in accordance with these measures in South Carolina in conjunction with its monthly data reporting. BellSouth will begin reporting data on these measures with August data (reported in September and October).

In conjunction with the new measures, the FPSC ordered BellSouth to pay penalties on measures CM-6, CM-7 and CM-11. Because of the FCC's focus on CCP, BellSouth is voluntarily agreeing to pay Tier II penalties on these same three measures (CM-6, CM-7 and CM-11), as set forth in the attached SQM pages, in South Carolina pursuant to the South Carolina Performance Measurement Plan and Incentive Payment Plan ("IPP").

While BellSouth will begin voluntarily implementing these measures as described herein, BellSouth also respectfully requests that this Commission amend the performance plan to incorporate these six measures. In addition, BellSouth will amend the SGAT to incorporate these penalties in the IPP. Please let me know if you have any questions about the information contained in this letter.

Sincerely,

  
Caroline N. Watson

CNW/nml

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<sup>1</sup> Acceptance of change requests is subject to technical feasibility, cost, and industry standards. See Section 4, Part 2, Types 2-5 Process Flow, Step 3.

## CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days

### Definition

Measures the percent of Software Errors corrected by BellSouth in X (10, 30, 45) business days within the report period.

### Exclusions

- Software Corrections having implementation intervals that are longer than those defined in this measure and agreed upon by the CLECs.

### Business Rules

This metric is designed to measure BellSouth's performance in correcting identified Software Errors within the specified interval. The clock starts when a Software Error is validated per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html), and stops when the error is corrected and notice is posted to the Change Control Website. Software defects are defined as Type 6 Change Requests in the Change Control Process.

### Calculation

Percent of software Errors Corrected in X (10, 30, 45) Business Days =  $(a + b) \times 100$

- a = Total number of Software Errors corrected where "X" = 10, 30, or 45 business days.
- b = Total number of Software Errors requiring correction where "X" = 10, 30, or 45 business days.

### Report Structure

- Severity 2 = 10 Business Days
- Severity 3 = 30 Business Days
- Severity 4 = 45 Business Days

### Data Retained

- Report Period
- Total Completed
- Total Completed Within X Business Days
- Disputed, Rejected or Reclassified Software Errors

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

### SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

## CM-7: Percent of Change Requests Accepted or Rejected Within 10 days

### Definition

Measures the percent of Change Requests other than Type 1 or Type 6 Change Requests, submitted by CLECs that are Accepted or Rejected by BellSouth in 10 business days within the report period.

### Exclusions

- Change Requests that are canceled or withdrawn before a response from BellSouth is due.

### Business Rules

The Acceptance/Rejection interval starts when the acknowledgement is due to the CLEC per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html). The clock ends when BellSouth issues an acceptance or rejection notice to the CLEC. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

### Calculation

Percent of Change Requests Accepted or Rejected within 10 Business Days =  $(a + b) \times 100$

- a = Total number of Change Requests accepted or rejected within 10 business days.
- b = Total number of Change Requests submitted in the reporting period.

### Report Structure

- BellSouth Aggregate

### Data Retained

- Report Period
- Requests Accepted or Rejected
- Total Requests

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

### SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

## CM-8: Percent Change Requests Rejected

### Definition

Measures the percent of Change Requests other than (Type 1 or Type 6 Change Requests) submitted by CLECs that are rejected by reason within the report period.

### Exclusions

- Change Requests that are cancelled or withdrawn by CLEC before a response from BellSouth is due.

### Business Rules

This metric includes any rejected change requests in the reporting period, regardless of whether received early or late. The metric will be disaggregated by major categories of rejections per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html). These reasons are: Cost, Technical Feasibility, and Industry Direction. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

### Calculation

$$\text{Percent Change Requests Rejected} = (a + b) \times 100$$

- a = Total number of Change Requests rejected.
- b = Total number of Change Requests submitted within the report period.

### Report Structure

- BellSouth Aggregate
- Cost
- Technical Feasibility
- Industry Direction

### Data Retained

- Report Period
- Requests Rejected
- Total Requests

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> <li>• Region</li> <li>• Reason -- Cost</li> <li>• Reason -- Technical Feasibility</li> <li>• Reason -- Industry Direction</li> </ul>	<ul style="list-style-type: none"> <li>• Diagnostic</li> </ul>

### SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>	<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>

## CM-9: Number of Defects in Production Releases (Type 6 CR)

### Definition

Measures the number of defects in Production Releases. This measure will be presented as the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definition of Type 6 Change Requests (CR) and Severity 1, Severity 2, and Severity 3 defects can be found in the Change Control Process Document.

### Exclusions

None.

### Business Rules

This metric measures the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definitions of Type 6 Change Requests (CR) and Severity 1, 2, and 3 defects can be found in the Change Control Process, which can be found at [http://www.interconnection.bellsouth.com/markets/lcc/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lcc/ccp_live/index.html).

### Calculation

- The number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, and the number of Type 6 Severity 3 defects.

### Report Structure

- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

### Data Retained

- Region
- Report Period
- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> <li>Region--Number of Type 6 Severity 1 defects</li> <li>Region--Number of Type 6 Severity 2 defects without a mechanized work around</li> <li>Region--Number of Type 6 Severity 3 defects</li> </ul>	<ul style="list-style-type: none"> <li>0 Defects</li> <li>0 Defects</li> <li>0 Defects</li> </ul>

### SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	



**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	•

## CM-10: Software Validation

### Definition

Measures software validation test results for Production Releases of BellSouth Local Interfaces.

### Exclusions

None

### Business Rules

BellSouth maintains a test deck of transactions that are used to validate that functionality in software Production Releases work as designed. Each transaction in the test deck is assigned a weight factor, which is based on the weights that have been assigned to the metrics. Within the software validation metric weight factors will be allocated among transaction types (e.g., Pre-Order, Order Resale, Order UNE, Order UNE-P) and then equally distributed across transactions within the specific type.

BellSouth will begin to execute the software validation test deck within one (1) business day following a Production Release. Test deck transactions will be executed using Production Release software in the CAVE environment. Within seven (7) business days following completion of the Production Release software validation test in CAVE, BellSouth will report the number of test deck transactions that failed. Each failed transaction will be multiplied by the transaction's weight factor.

A transaction is considered failed if the request cannot be submitted or processed, or the results in incorrect or improperly formatted data.

### Calculation

This software validation metric is defined as the ratio of the sum of the weights of failed transactions using Production Release software in CAVE to the sum of the weights of all transaction in the test deck.

- Numerator = Sum of weights of failed transactions
- Denominator = Sum of weights of all transactions in the test deck

### Report Structure

- BellSouth Aggregate

### Data Retained

- Report Period
- Production Release Number
- Test Deck Weights
- % Test Deck Weight Failure

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• ≤ 5%

**SEEM Measure**

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
.	.

## CM-11: Percent of Change Requests Implemented Within 60 weeks of Prioritization

### Definition

Measures whether BellSouth provides CLECs timely implementation of prioritized change requests.

### Exclusions

- Change requests that are implemented later than 60 weeks with the consent of the CLECs.
- Change requests for which BellSouth has regulatory authority to exceed the interval

### Business Rules

This metric is designed to measure BellSouth's performance in implementing prioritized change requests. The clock starts when a change request has been prioritized as described in the Change Control Process. The clock stops when the change request has been implemented by BellSouth and made available to the CLECs. BellSouth will begin reporting this measure with the next release for diagnostic purposes, and will be measured for SEEM purposes 60 weeks from first prioritization meeting following Commission approval of this measure.

### Calculation

**Percent of Type 5 CLEC initiated Change Requests implemented on time =  $(a \div b) \times 100$**

- a = Total number of prioritized Type 5 CLEC initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 5 CLEC initiated Change Requests from the date of the release prioritization list

**Percent of Type 4 BellSouth initiated Change Requests Implemented on time =  $(a \div b) \times 100$**

- a = Total number of prioritized Type 4 BellSouth initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 4 BellSouth initiated Change Requests from the date of the release prioritization list

### Report Structure

- BellSouth Aggregate
- Type 4 requests implemented
- Type 5 requests implemented
- % implemented within 16, 32, 48, and 60 weeks

### Data Retained

- Region
- Report Month
- Total implemented by type
- Total implemented within 60 weeks

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval
• Type 4 requests implemented	• 95% within interval
• Type 5 requests implemented	• 95% within interval

**SEEM Measure**

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

**BellSouth Telecommunications, Inc.**  
**Alabama Legal Department**  
3196 Highway 280 South  
Room 304N  
Birmingham, AL 35243

francis.semmes@bellsouth.com

**Francis B. Semmes**  
General Counsel - AL

205 972 2556  
Fax 205 969 2285

August 9, 2002

**VIA OVERNIGHT MAIL**

Walter Thomas, Secretary  
Alabama Public Service Commission  
100 N. Union Street -- 8<sup>th</sup> Floor  
RSA Union Building  
Montgomery, AL 36104

**Re: Petition for Approval of a Statement of Generally Available Terms  
and Conditions Pursuant to §252(f) of the Telecommunications Act of  
1996 and Notification of Intention to File a Petition for In-region  
InterLATA Authority With the FCC Pursuant to §271 of the  
Telecommunications Act of 1996 - Docket No. 25835**

Dear Mr. Thomas:

Recently, the Florida Public Service Commission ("FPSC") adopted six (6) additional change control measures. These measures are as follows:

- CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days
- CM-7: Percent of Change Requests Accepted or Rejected Within 10 Days
- CM-8: Percent of Change Requests Rejected
- CM-9: Number of Defects in Production Releases (Type 6 CR)
- CM-10: Software Validation
- CM-11: Percent of Change Requests Implemented Within 60 Weeks of Prioritization<sup>1</sup>

Copies of the Service Quality Measurements ("SQM") Plan pages for these measures are attached to this letter.

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<sup>1</sup> Acceptance of change requests is subject to technical feasibility, cost, and industry standards. See Change Control Process Document, Section 4, Part 2, Types 2-5 Process Flow, Step 3.

Mr. Walter Thomas  
Page Two  
August 9, 2002

As the Alabama Public Service Commission ("Commission") is aware, several state commissions and the Federal Communications Commission ("FCC") have focused attention on BellSouth's Change Control Process ("CCP"). Consequently, BellSouth will report regional data collected in accordance with these measures in Alabama in conjunction with its monthly data reporting. BellSouth will begin reporting data on these measures with August data (reported in September and October).

In conjunction with the new measures, the FPSC ordered BellSouth to pay penalties on measures CM-6, CM-7 and CM-11. Because of the FCC focus on CCP, BellSouth is voluntarily agreeing to pay Tier II penalties on these same three measures (CM-6, CM-7 and CM-11), as set forth in the attached SQM pages, in Alabama pursuant to the Self-Effectuating Enforcement Mechanism ("SEEM") Plan.

While BellSouth will begin voluntarily implementing these measures as described herein, BellSouth also respectfully requests that this Commission amend the performance plan to incorporate these six measures and the associated penalties. Please let me know if you have any questions about the information contained in this letter.

Sincerely,

  
Francis B. Semmes

FBS/mhs  
Attachments

cc: Honorable John Garner, ALJ (Via Overnight Mail)  
Mr. Darrell A. Baker, Director (Via Overnight Mail)  
Mr. Larry Smith (Via Overnight Mail)  
Parties of Record

## CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days

### Definition

Measures the percent of Software Errors corrected by BellSouth in X (10, 30, 45) business days within the report period.

### Exclusions

- Software Corrections having implementation intervals that are longer than those defined in this measure and agreed upon by the CLECs.

### Business Rules

This metric is designed to measure BellSouth's performance in correcting identified Software Errors within the specified interval. The clock starts when a Software Error is validated per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html), and stops when the error is corrected and notice is posted to the Change Control Website. Software defects are defined as Type 6 Change Requests in the Change Control Process.

### Calculation

Percent of software Errors Corrected in X (10, 30, 45) Business Days =  $(a + b) \times 100$

- a = Total number of Software Errors corrected where "X" = 10, 30, or 45 business days.
- b = Total number of Software Errors requiring correction where "X" = 10, 30, or 45 business days.

### Report Structure

- Severity 2 = 10 Business Days
- Severity 3 = 30 Business Days
- Severity 4 = 45 Business Days

### Data Retained

- Report Period
- Total Completed
- Total Completed Within X Business Days
- Disputed, Rejected or Reclassified Software Errors

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

### SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval



## CM-7: Percent of Change Requests Accepted or Rejected Within 10 days

### Definition

Measures the percent of Change Requests other than Type 1 or Type 6 Change Requests, submitted by CLECs that are Accepted or Rejected by BellSouth in 10 business days within the report period.

### Exclusions

- Change Requests that are canceled or withdrawn before a response from BellSouth is due.

### Business Rules

The Acceptance/Rejection interval starts when the acknowledgement is due to the CLEC per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html). The clock ends when BellSouth issues an acceptance or rejection notice to the CLEC. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

### Calculation

Percent of Change Requests Accepted or Rejected within 10 Business Days =  $(a \div b) \times 100$

- a = Total number of Change Requests accepted or rejected within 10 business days.
- b = Total number of Change Requests submitted in the reporting period.

### Report Structure

- BellSouth Aggregate

### Data Retained

- Report Period
- Requests Accepted or Rejected
- Total Requests

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

### SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

## CM-8: Percent Change Requests Rejected

### Definition

Measures the percent of Change Requests other than (Type 1 or Type 6 Change Requests) submitted by CLECs that are rejected by reason within the report period.

### Exclusions

- Change Requests that are cancelled or withdrawn by CLEC before a response from BellSouth is due.

### Business Rules

This metric includes any rejected change requests in the reporting period, regardless of whether received early or late. The metric will be disaggregated by major categories of rejections per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html). These reasons are: Cost, Technical Feasibility, and Industry Direction. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

### Calculation

$$\text{Percent Change Requests Rejected} = (a \div b) \times 100$$

- a = Total number of Change Requests rejected.
- b = Total number of Change Requests submitted within the report period.

### Report Structure

- BellSouth Aggregate
- Cost
- Technical Feasibility
- Industry Direction

### Data Retained

- Report Period
- Requests Rejected
- Total Requests

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> <li>Region</li> <li>Reason -- Cost</li> <li>Reason -- Technical Feasibility</li> <li>Reason -- Industry Direction</li> </ul>	<ul style="list-style-type: none"> <li>Diagnostic</li> </ul>

### SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> <li>Not Applicable</li> </ul>	<ul style="list-style-type: none"> <li>Not Applicable</li> </ul>

## CM-9: Number of Defects in Production Releases (Type 6 CR)

### Definition

Measures the number of defects in Production Releases. This measure will be presented as the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definition of Type 6 Change Requests (CR) and Severity 1, Severity 2, and Severity 3 defects can be found in the Change Control Process Document.

### Exclusions

None.

### Business Rules

This metric measures the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definitions of Type 6 Change Requests (CR) and Severity 1, 2, and 3 defects can be found in the Change Control Process, which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html).

### Calculation

- The number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, and the number of Type 6 Severity 3 defects.

### Report Structure

- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

### Data Retained

- Region
- Report Period
- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> <li>Region--Number of Type 6 Severity 1 defects</li> <li>Region--Number of Type 6 Severity 2 defects without a mechanized work around</li> <li>Region--Number of Type 6 Severity 3 defects</li> </ul>	<ul style="list-style-type: none"> <li>0 Defects</li> <li>0 Defects</li> <li>0 Defects</li> </ul>

### SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	•

## CM-10: Software Validation

### Definition

Measures software validation test results for Production Releases of BellSouth Local Interfaces.

### Exclusions

None

### Business Rules

BellSouth maintains a test deck of transactions that are used to validate that functionality in software Production Releases work as designed. Each transaction in the test deck is assigned a weight factor, which is based on the weights that have been assigned to the metrics. Within the software validation metric weight factors will be allocated among transaction types (e.g., Pre-Order, Order Resale, Order UNE, Order UNE-P) and then equally distributed across transactions within the specific type.

BellSouth will begin to execute the software validation test deck within one (1) business day following a Production Release. Test deck transactions will be executed using Production Release software in the CAVE environment. Within seven (7) business days following completion of the Production Release software validation test in CAVE, BellSouth will report the number of test deck transactions that failed. Each failed transaction will be multiplied by the transaction's weight factor.

A transaction is considered failed if the request cannot be submitted or processed, or the results in incorrect or improperly formatted data.

### Calculation

This software validation metric is defined as the ratio of the sum of the weights of failed transactions using Production Release software in CAVE to the sum of the weights of all transaction in the test deck.

- Numerator = Sum of weights of failed transactions
- Denominator = Sum of weights of all transactions in the test deck

### Report Structure

- BellSouth Aggregate

### Data Retained

- Report Period
- Production Release Number
- Test Deck Weights
- % Test Deck Weight Failure

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• ≤ 5%

**SEEM Measure**

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
•	•

## CM-11: Percent of Change Requests Implemented Within 60 weeks of Prioritization

### Definition

Measures whether BellSouth provides CLECs timely implementation of prioritized change requests.

### Exclusions

- Change requests that are implemented later than 60 weeks with the consent of the CLECs.
- Change requests for which BellSouth has regulatory authority to exceed the interval

### Business Rules

This metric is designed to measure BellSouth's performance in implementing prioritized change requests. The clock starts when a change request has been prioritized as described in the Change Control Process. The clock stops when the change request has been implemented by BellSouth and made available to the CLECs. BellSouth will begin reporting this measure with the next release for diagnostic purposes, and will be measured for SEEM purposes 60 weeks from first prioritization meeting following Commission approval of this measure.

### Calculation

**Percent of Type 5 CLEC initiated Change Requests implemented on time =  $(a + b) \times 100$**

- a = Total number of prioritized Type 5 CLEC initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 5 CLEC initiated Change Requests from the date of the release prioritization list

**Percent of Type 4 BellSouth initiated Change Requests implemented on time =  $(a + b) \times 100$**

- a = Total number of prioritized Type 4 BellSouth initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 4 BellSouth initiated Change Requests from the date of the release prioritization list

### Report Structure

- BellSouth Aggregate
- Type 4 requests implemented
- Type 5 requests implemented
- % implemented within 16, 32, 48, and 60 weeks

### Data Retained

- Region
- Report Month
- Total implemented by type
- Total implemented within 60 weeks

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval
• Type 4 requests implemented	• 95% within interval
• Type 5 requests implemented	• 95% within interval

**SEEM Measure**

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation		SEEM Analog/Benchmark	
• Region		• 95% within interval	



## **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing on all parties of record by placing a copy of same in the United States Mail, postage prepaid, on this the **9th** of **August, 2002**.

Bill Atkinson  
Sprint Communications Company, LP  
Mail Stop: GAATLDO602  
3065 Cumberland Blvd.  
Atlanta, GA 30339

Andrew O. Isar  
Telecommunications Resellers Association  
4312 92<sup>nd</sup> Avenue NW  
Gig Harbor, WA 98335

De O'Roark Esq.  
WorldCom, Inc.  
Concourse Corp. Center 6  
6 Concourse Parkway – Suite 3200  
Atlanta, GA 30328

Mr. Dennis Dearing  
Communications Workers of America  
Mountain Brook Center, Suite 107  
2700 Highway 280 East  
Birmingham, Alabama 35223

Brian P. Strength \*  
Attorney for AT&T  
Bradley, Arant, Rose & White LLP  
100 N. Union Street, Suite 650  
Montgomery, AL 36104

Peter S. Fruin  
Attorney for ACSI  
Maynard, Cooper & Gale, PC  
201 Monroe Street, Suite 1940  
Montgomery, AL 36104

Nanette S. Edwards  
DeltaCom, Inc.  
4092 S. Memorial Parkway  
Huntsville, AL 35802

Julie K. Corsig, Esq.  
Attorney for CompTel  
Davis Wright Tremaine LLP  
1500 K Street NW  
Suite 450  
Washington, D.C. 20005-1272

Jeff Holmes  
Attorney for BSLD  
Lange, Simpson, Robinson & Somerville  
1700 First Alabama Bank Building  
Birmingham, AL 35203

Michael A. Hopkins  
McKenna & Cuneo  
1900 K Street, N.W., Suite 100  
Washington, D.C. 20006

Olivia W. Martin  
Attorney General's Office  
Alabama State House  
11 South Union Street  
Montgomery, AL 36130

Wendell Cauley  
Attorney for Sprint  
Bradley, Arant, Rose & White  
504 S. Perry Street  
P. O. Box 1748  
Montgomery, AL 36102-1748

David M. Eppsteiner  
James P. Lamoreux  
AT&T  
1200 Peachtree St., N.E.  
Atlanta, GA 30309

Catherine F. Boone  
Covad Communications Company  
10 Glenlake Parkway, Suite 130  
Atlanta, Georgia 30328

Mr. David McClure  
Telecom Consultants, Inc.  
7250 Governors Way, SW  
Huntsville, AL 35806

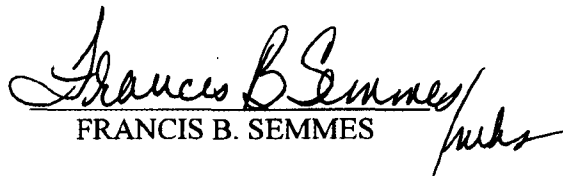
Henry C. Campen, Jr.,  
Parker, Poe, Adams & Bernstein  
150 Fayetteville Street Mall, Suite 1400  
Raleigh, NC 27602-

Jonathan E. Canis  
Enrico C. Soriano  
Kelley Drye & Warren  
1200 19th Street, N.W.  
Suite 500  
Washington, D.C. 20036

Andrew M. Kline  
Kelley Drye & Warren, LLP  
1200 19<sup>th</sup> Street, N.W.  
Suite 500  
Washington, D. C. 20036

Mr. John McLaughlin  
KMC Telecom, Inc.  
1755 N. Brown Road  
Lawrenceville, GA 30043

Kenneth D. Wallis  
Capell & Howard, Esq.  
150 South Perry Street  
Montgomery, AL 36104

  
FRANCIS B. SEMMES

**BellSouth Telecommunications, Inc.**  
601 W. Chestnut Street  
Room 407  
Louisville, KY 40203

Creighton.Mershon@BellSouth.com

**Creighton E. Mershon, Sr.**  
General Counsel/Kentucky

502 582 8219  
Fax 502 582 1573

August 9, 2002

Mr. Thomas M. Dorman  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P. O. Box 615  
Frankfort, KY 40602

Re: Investigation Concerning the Propriety of InterLATA Services by  
BellSouth Telecommunications, Inc. Pursuant to the Telecommunications  
Act of 1996  
PSC 2001-105

Dear Mr. Dorman;

Recently, the Florida Public Service Commission adopted 6 additional change control measures. These measures are as follows:

- CM-6: Percent of Software Errors Corrected in X(10, 30, 45) Business Days
- CM-7: Percent of Change Requests Accepted or Rejected Within 10 Days
- CM-8: Percent Change Requests Rejected
- CM-9: Number of Defects in Production Releases (Type 6 CR)
- CM-10: Software Validation
- CM-11: Percent of Change Requests Implemented Within 60 Weeks of Prioritization<sup>1</sup>

Copies of the SQM pages for these measures are attached to this letter.

As the Commission is aware, several state commissions and the FCC have focused attention on BellSouth's CCP process. Consequently, BellSouth will report

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<sup>1</sup> Acceptance of change requests is subject to technical feasibility, cost, and industry standards. See Section 4, Part 2, Types 2-5 Process Flow, Step 3.

Mr. Thomas M. Dorman  
August 9, 2002  
Page 2


regional data collected in accordance with these measures in Kentucky in conjunction with its monthly data reporting. BellSouth will begin reporting data on these measures with August data (reported in September and October).

In conjunction with the new measures, the FPSC ordered BellSouth to pay penalties on measures CM-6, CM-7 and CM-11. Because of the FCC focus on CCP, BellSouth is voluntarily agreeing to pay Tier II penalties on these same three measures (CM-6, CM-7 and CM-11), as set forth in the attached SQM pages, in Kentucky pursuant to the BellSouth Service Quality Measurement Plan. Kentucky Tariff 10C, Attachment 1 will be updated to include these changes by August 15, 2002.

While BellSouth will begin voluntarily implementing these measures as described herein, BellSouth also respectfully requests that this Commission amend the performance plan to incorporate these six measures and the associated penalties. Please let me know if you have any questions about the information contained in this letter.

One paper copy and a CD-ROM of the filing are provided to the Commission. A CD is provided to all parties of record.

Sincerely,

  
Creighton E. Mershon, Sr.

Enclosures

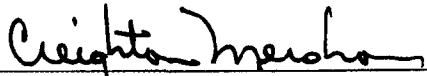
cc: Parties of Record

458321

**CERTIFICATION**

I hereby certify that the electronic version of this filing made with the Commission this 9th day of August 2002 is a true and accurate copy of the documents filed herewith in paper form, that the electronic version of the filing has been transmitted to the Commission and that the Commission and parties of record have been notified by electronic mail that the electronic version of this document has been transmitted to the Commission.

I also certify that a copy of the foregoing was served on the individuals on the Service List by mailing a CD-ROM containing the filing, this 9th day of August 2002.

  
\_\_\_\_\_  
Creighton E. Mershon, Sr.

## **SERVICE LIST - PSC 2001-105**

Honorable Richard M. Sullivan  
Honorable Edward F. Busch  
Conliffe, Sandmann & Sullivan  
2000 Waterfront Plaza  
325 West Main Street  
Louisville, KY 40202  
**Counsel for AT&T**

Ms. Sylvia Anderson  
AT&T Communications  
Suite 8100  
1200 Peachtree Street, N.E.  
Atlanta, GA 30309

Mr. Gene Coker  
AT&T Communications  
Suite 8100  
1200 Peachtree Street, N.E.  
Atlanta, GA 30309

Sonia Daniels  
AT&T Communications  
Suite 8100  
1200 Peachtree Street, N.E.  
Atlanta, GA 30309

Aurelie Djoumbissie  
AT&T Communications  
Suite 8100  
1200 Peachtree Street, N.E.  
Atlanta, GA 30309

Hon. John N. Hughes  
Attorney at Law  
124 West Todd Street  
Frankfort, KY 40601  
**Counsel for Sprint**

Hon. William R. Atkinson  
Sprint Communications Co., LP  
3065 Cumberland Blvd.  
Mailstop: GAATLD0602  
Atlanta, GA 30339

Hon. C. Kent Hatfield  
Hon. Henry S. Alford  
Middleton & Reutlinger  
2500 Brown & Williamson Tower  
Louisville, KY 40202  
**Counsel for WorldCom, SECCA & Covad**

Hon. Susan J. Berlin  
WorldCom  
Suite 3200  
6 Concourse Parkway  
Atlanta, GA 30328

Katherine K. Yunker  
836 Euclid Avenue, Suite 301  
P. O. Box 21784  
Lexington, KY 40522-1784  
**Counsel for LCI International Telecom  
Corporation, d/b/a Qwest Communications  
Services**

Kathy Ford  
Dept. of Policy & Law  
**LCI International Telecom Corporation d/b/a  
Qwest Communications Services**  
1801 California Street, 49th Floor  
Denver, CO 80202

John E. Selent, Esq.  
Dinsmore & Shohl LLP  
2000 Meidinger Tower  
Louisville, KY 40202  
**Counsel for e.spire**

Ms. Nanette Edwards  
DeltaCom, Inc.  
4092 S. Memorial Parkway  
Huntsville, AL 35802

Mr. Andrew O. Isar  
Miller Isar, Inc.  
ASCENT (Assoc. of Communications  
Enterprises)  
7901 Skansie Avenue, Suite 240  
Gig Harbor, WA 98335

Hon. Henry Campen  
Parker, Poe, Adams & Bernstein  
150 Fayetteville Mall  
P. O. Box 389  
Raleigh, NC 27602  
**Counsel for ICG**

Amy Hartzler  
ICG Telecom Group, Inc.  
P. O. Box 6742  
161 Inverness Drive, West  
Englewood, CO 80112

Ms. Wanda G. Montano  
VP, Regulatory & Industry Affairs  
US LEC Corporation  
6801 Morrison Boulevard  
Charlotte, NC. 28211

Hamilton Russell  
NuVox Communications, Inc.  
200 N. Main Street, Suite 303  
Greenville, SC 29601

**KENTUCKY**

**Case No. 2001-105**

**BST'S Filing of August 9, 2002**

**INDEX**

BST_READ1ST_080902.pdf	Transmittal Letter, Certification, and Service List
BST_ATT_CM-6_080902.pdf	Attachment CM-6, Percent of Software Errors Corrected in X (10, 30, 45) Business Days
BST_ATT_CM-7_080902.pdf	Attachment CM-7, Percent of Change Requests Accepted or Rejected Within 10 Days
BST_ATT_CM-8_080902.pdf	Attachment CM-8, Percent Change Requests Rejected
BST_ATT_CM-9_080902.pdf	Attachment CM-9, Number of Defects in Production Releases (Type 6 CR)
BST_ATT_CM-10_080902.pdf	Attachment CM-10, Software Validation
BST_ATT_CM-11_080902.pdf	Attachment CM-11, Percent of Change Requests Implemented Within 60 Weeks of Prioritization



## CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days

### Definition

Measures the percent of Software Errors corrected by BellSouth in X (10, 30, 45) business days within the report period.

### Exclusions

- Software Corrections having implementation intervals that are longer than those defined in this measure and agreed upon by the CLECs.

### Business Rules

This metric is designed to measure BellSouth's performance in correcting identified Software Errors within the specified interval. The clock starts when a Software Error is validated per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html), and stops when the error is corrected and notice is posted to the Change Control Website. Software defects are defined as Type 6 Change Requests in the Change Control Process.

### Calculation

**Percent of software Errors Corrected in X (10, 30, 45) Business Days =  $(a \div b) \times 100$**

- a = Total number of Software Errors corrected where "X" = 10, 30, or 45 business days.
- b = Total number of Software Errors requiring correction where "X" = 10, 30, or 45 business days.

### Report Structure

- Severity 2 = 10 Business Days
- Severity 3 = 30 Business Days
- Severity 4 = 45 Business Days

### Data Retained

- Report Period
- Total Completed
- Total Completed Within X Business Days
- Disputed, Rejected or Reclassified Software Errors

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

### SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

## CM-7: Percent of Change Requests Accepted or Rejected Within 10 days

### Definition

Measures the percent of Change Requests other than Type 1 or Type 6 Change Requests, submitted by CLECs that are Accepted or Rejected by BellSouth in 10 business days within the report period.

### Exclusions

- Change Requests that are canceled or withdrawn before a response from BellSouth is due.

### Business Rules

The Acceptance/Rejection interval starts when the acknowledgement is due to the CLEC per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html). The clock ends when BellSouth issues an acceptance or rejection notice to the CLEC. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

### Calculation

Percent of Change Requests Accepted or Rejected within 10 Business Days =  $(a + b) \times 100$

- a = Total number of Change Requests accepted or rejected within 10 business days.
- b = Total number of Change Requests submitted in the reporting period.

### Report Structure

- BellSouth Aggregate

### Data Retained

- Report Period
- Requests Accepted or Rejected
- Total Requests

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

### SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

## CM-8: Percent Change Requests Rejected

### Definition

Measures the percent of Change Requests other than (Type 1 or Type 6 Change Requests) submitted by CLECs that are rejected by reason within the report period.

### Exclusions

- Change Requests that are cancelled or withdrawn by CLEC before a response from BellSouth is due.

### Business Rules

This metric includes any rejected change requests in the reporting period, regardless of whether received early or late. The metric will be disaggregated by major categories of rejections per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html). These reasons are: Cost, Technical Feasibility, and Industry Direction. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

### Calculation

Percent Change Requests Rejected =  $(a \div b) \times 100$

- a = Total number of Change Requests rejected.
- b = Total number of Change Requests submitted within the report period.

### Report Structure

- BellSouth Aggregate
- Cost
- Technical Feasibility
- Industry Direction

### Data Retained

- Report Period
- Requests Rejected
- Total Requests

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> <li>• Region</li> <li>• Reason – Cost</li> <li>• Reason – Technical Feasibility</li> <li>• Reason – Industry Direction</li> </ul>	<ul style="list-style-type: none"> <li>• Diagnostic</li> </ul>

### SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>	<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>

## CM-9: Number of Defects in Production Releases (Type 6 CR)

### Definition

Measures the number of defects in Production Releases. This measure will be presented as the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definition of Type 6 Change Requests (CR) and Severity 1, Severity 2, and Severity 3 defects can be found in the Change Control Process Document.

### Exclusions

None.

### Business Rules

This metric measures the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definitions of Type 6 Change Requests (CR) and Severity 1, 2, and 3 defects can be found in the Change Control Process, which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html).

### Calculation

- The number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, and the number of Type 6 Severity 3 defects.

### Report Structure

- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

### Data Retained

- Region
- Report Period
- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> <li>Region--Number of Type 6 Severity 1 defects</li> <li>Region--Number of Type 6 Severity 2 defects without a mechanized work around</li> <li>Region--Number of Type 6 Severity 3 defects</li> </ul>	<ul style="list-style-type: none"> <li>0 Defects</li> <li>0 Defects</li> <li>0 Defects</li> </ul>

### SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	•

## CM-10: Software Validation

### Definition

Measures software validation test results for Production Releases of BellSouth Local Interfaces.

### Exclusions

None

### Business Rules

BellSouth maintains a test deck of transactions that are used to validate that functionality in software Production Releases work as designed. Each transaction in the test deck is assigned a weight factor, which is based on the weights that have been assigned to the metrics. Within the software validation metric weight factors will be allocated among transaction types (e.g., Pre-Order, Order Resale, Order UNE, Order UNE-P) and then equally distributed across transactions within the specific type.

BellSouth will begin to execute the software validation test deck within one (1) business day following a Production Release. Test deck transactions will be executed using Production Release software in the CAVE environment. Within seven (7) business days following completion of the Production Release software validation test in CAVE, BellSouth will report the number of test deck transactions that failed. Each failed transaction will be multiplied by the transaction's weight factor.

A transaction is considered failed if the request cannot be submitted or processed, or the results in incorrect or improperly formatted data.

### Calculation

This software validation metric is defined as the ratio of the sum of the weights of failed transactions using Production Release software in CAVE to the sum of the weights of all transaction in the test deck.

- Numerator = Sum of weights of failed transactions
- Denominator = Sum of weights of all transactions in the test deck

### Report Structure

- BellSouth Aggregate

### Data Retained

- Report Period
- Production Release Number
- Test Deck Weights
- % Test Deck Weight Failure

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• ≤ 5%

**SEEM Measure**

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
•	•

## CM-11: Percent of Change Requests Implemented Within 60 weeks of Prioritization

### Definition

Measures whether BellSouth provides CLECs timely implementation of prioritized change requests.

### Exclusions

- Change requests that are implemented later than 60 weeks with the consent of the CLECs.
- Change requests for which BellSouth has regulatory authority to exceed the interval

### Business Rules

This metric is designed to measure BellSouth's performance in implementing prioritized change requests. The clock starts when a change request has been prioritized as described in the Change Control Process. The clock stops when the change request has been implemented by BellSouth and made available to the CLECs. BellSouth will begin reporting this measure with the next release for diagnostic purposes, and will be measured for SEEM purposes 60 weeks from first prioritization meeting following Commission approval of this measure.

### Calculation

**Percent of Type 5 CLEC initiated Change Requests implemented on time =  $(a + b) \times 100$**

- $a$  = Total number of prioritized Type 5 CLEC initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- $b$  = Total number of prioritized Type 5 CLEC initiated Change Requests from the date of the release prioritization list

**Percent of Type 4 BellSouth initiated Change Requests implemented on time =  $(a + b) \times 100$**

- $a$  = Total number of prioritized Type 4 BellSouth initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- $b$  = Total number of prioritized Type 4 BellSouth initiated Change Requests from the date of the release prioritization list

### Report Structure

- BellSouth Aggregate
- Type 4 requests implemented
- Type 5 requests implemented
- % implemented within 16, 32, 48, and 60 weeks

### Data Retained

- Region
- Report Month
- Total implemented by type
- Total implemented within 60 weeks

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval
• Type 4 requests implemented	• 95% within interval
• Type 5 requests implemented	• 95% within interval



**SEEM Measure**

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation		SEEM Analog/Benchmark	
• Region		• 95% within interval	

**BellSouth Telecommunications, Inc.**  
**Legal Department**  
365 Canal Street  
Suite 3060  
New Orleans, LA 70130

**Victoria K. McHenry**  
General Counsel-LA

504 528 2050  
Fax 504 528 2948

August 9, 2002

Mr. Lawrence C. St. Blanc  
Secretary  
Louisiana Public Service Commission  
P. O. Box 91154  
Baton Rouge, LA 70821

RE: LPSC Docket No. U-22252-C  
BellSouth's Service Quality Performance  
Measurements ("SQPM")

Dear Mr. St. Blanc:

Recently, the Florida Public Service Commission adopted 6 additional change control measures. These measures are as follows:

- CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days
- CM-7: Percent of Change Requests Accepted or Rejected Within 10 Days'
- CM-8: Percent of Change Requests Rejected
- CM-9: Number of Defects in Production Releases (Type 6 CR)
- CM-10: Software Validation
- CM-11: Percent of Change Requests Implemented Within 60 Weeks of Prioritization<sup>1</sup>

Copies of the SQM pages for these measures are attached to this letter.

As the Commission is aware, several state commissions and the FCC have focused attention on BellSouth's CCP process. Consequently, BellSouth will report regional data collected in accordance with these measures in Louisiana in conjunction with its monthly data reporting. BellSouth will begin reporting data on these measures with August data (reported in September and October).

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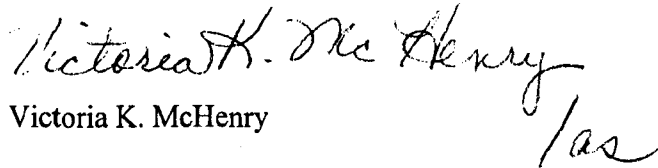
<sup>1</sup> Acceptance of change requests is subject to technical feasibility, cost, and industry standards. See Section 4, Part 2, Types 2-5 Process Flow, Step 3.

In conjunction with the new measures, the FPSC ordered BellSouth to pay penalties on measures CM-6, CM-7 and CM-11. Because of the FCC's focus on CCP, BellSouth is voluntarily agreeing to pay Tier II penalties on these same three measures (CM-6, CM-7 and CM-11), as set forth in the attached SQM pages, in Louisiana pursuant to BellSouth's Service Quality Performance Measurements Plan and BellSouth's Self-Effectuating Enforcement Mechanism (SEEM) Administrative Plan.

While BellSouth will begin voluntarily implementing these measures as described herein, BellSouth also respectfully requests that this Commission amend the performance plan to incorporate these six measures and the associated penalties.

Additionally, BellSouth respectfully recommends that the foregoing issues be incorporated into the agenda for the August 21-22 workshop in Docket U-22252-C. Please let me know if you have any questions about the information contained in this letter.

Sincerely,

  
Victoria K. McHenry

Attachments

cc: Official Service List (w/attachments)

## CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days

### Definition

Measures the percent of Software Errors corrected by BellSouth in X (10, 30, 45) business days within the report period.

### Exclusions

- Software Corrections having implementation intervals that are longer than those defined in this measure and agreed upon by the CLECs.

### Business Rules

This metric is designed to measure BellSouth's performance in correcting identified Software Errors within the specified interval. The clock starts when a Software Error is validated per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html), and stops when the error is corrected and notice is posted to the Change Control Website. Software defects are defined as Type 6 Change Requests in the Change Control Process.

### Calculation

Percent of software Errors Corrected in X (10, 30, 45) Business Days =  $(a \div b) \times 100$

- a = Total number of Software Errors corrected where "X" = 10, 30, or 45 business days.
- b = Total number of Software Errors requiring correction where "X" = 10, 30, or 45 business days.

### Report Structure

- Severity 2 = 10 Business Days
- Severity 3 = 30 Business Days
- Severity 4 = 45 Business Days

### Data Retained

- Report Period
- Total Completed
- Total Completed Within X Business Days
- Disputed, Rejected or Reclassified Software Errors

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

### SEEM Measure

SEEM Measure		
	Tier I	
Yes	Tier II	Yes

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

## CM-7: Percent of Change Requests Accepted or Rejected Within 10 days

### Definition

Measures the percent of Change Requests other than Type 1 or Type 6 Change Requests, submitted by CLECs that are Accepted or Rejected by BellSouth in 10 business days within the report period.

### Exclusions

- Change Requests that are canceled or withdrawn before a response from BellSouth is due.

### Business Rules

The Acceptance/Rejection interval starts when the acknowledgement is due to the CLEC per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html). The clock ends when BellSouth issues an acceptance or rejection notice to the CLEC. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

### Calculation

Percent of Change Requests Accepted or Rejected within 10 Business Days =  $(a \div b) \times 100$

- a = Total number of Change Requests accepted or rejected within 10 business days.
- b = Total number of Change Requests submitted in the reporting period.

### Report Structure

- BellSouth Aggregate

### Data Retained

- Report Period
- Requests Accepted or Rejected
- Total Requests

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

### SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

## CM-8: Percent Change Requests Rejected

### Definition

Measures the percent of Change Requests other than (Type 1 or Type 6 Change Requests) submitted by CLECs that are rejected by reason within the report period.

### Exclusions

- Change Requests that are cancelled or withdrawn by CLEC before a response from BellSouth is due.

### Business Rules

This metric includes any rejected change requests in the reporting period, regardless of whether received early or late. The metric will be disaggregated by major categories of rejections per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html). These reasons are: Cost, Technical Feasibility, and Industry Direction. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

### Calculation

**Percent Change Requests Rejected =  $(a \div b) \times 100$**

- a = Total number of Change Requests rejected.
- b = Total number of Change Requests submitted within the report period.

### Report Structure

- BellSouth Aggregate
- Cost
- Technical Feasibility
- Industry Direction

### Data Retained

- Report Period
- Requests Rejected
- Total Requests

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> <li>Region</li> <li>Reason – Cost</li> <li>Reason – Technical Feasibility</li> <li>Reason – Industry Direction</li> </ul>	<ul style="list-style-type: none"> <li>Diagnostic</li> </ul>

### SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> <li>Not Applicable</li> </ul>	<ul style="list-style-type: none"> <li>Not Applicable</li> </ul>

## CM-9: Number of Defects in Production Releases (Type 6 CR)

### Definition

Measures the number of defects in Production Releases. This measure will be presented as the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definition of Type 6 Change Requests (CR) and Severity 1, Severity 2, and Severity 3 defects can be found in the Change Control Process Document.

### Exclusions

None.

### Business Rules

This metric measures the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definitions of Type 6 Change Requests (CR) and Severity 1, 2, and 3 defects can be found in the Change Control Process, which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html).

### Calculation

- The number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, and the number of Type 6 Severity 3 defects.

### Report Structure

- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

### Data Retained

- Region
- Report Period
- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

## SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> <li>Region--Number of Type 6 Severity 1 defects</li> <li>Region--Number of Type 6 Severity 2 defects without a mechanized work around</li> <li>Region--Number of Type 6 Severity 3 defects</li> </ul>	<ul style="list-style-type: none"> <li>0 Defects</li> <li>0 Defects</li> <li>0 Defects</li> </ul>

### SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	•



## CM-10: Software Validation

### Definition

Measures software validation test results for Production Releases of BellSouth Local Interfaces.

### Exclusions

None

### Business Rules

BellSouth maintains a test deck of transactions that are used to validate that functionality in software Production Releases work as designed. Each transaction in the test deck is assigned a weight factor, which is based on the weights that have been assigned to the metrics. Within the software validation metric weight factors will be allocated among transaction types (e.g., Pre-Order, Order Resale, Order UNE, Order UNE-P) and then equally distributed across transactions within the specific type.

BellSouth will begin to execute the software validation test deck within one (1) business day following a Production Release. Test deck transactions will be executed using Production Release software in the CAVE environment. Within seven (7) business days following completion of the Production Release software validation test in CAVE, BellSouth will report the number of test deck transactions that failed. Each failed transaction will be multiplied by the transaction's weight factor.

A transaction is considered failed if the request cannot be submitted or processed, or the results in incorrect or improperly formatted data.

### Calculation

This software validation metric is defined as the ratio of the sum of the weights of failed transactions using Production Release software in CAVE to the sum of the weights of all transaction in the test deck.

- Numerator = Sum of weights of failed transactions
- Denominator = Sum of weights of all transactions in the test deck

### Report Structure

- BellSouth Aggregate

### Data Retained

- Report Period
- Production Release Number
- Test Deck Weights
- % Test Deck Weight Failure

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• ≤ 5%

**SEEM Measure**

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
•	•

## CM-11: Percent of Change Requests Implemented Within 60 weeks of Prioritization

### Definition

Measures whether BellSouth provides CLECs timely implementation of prioritized change requests.

### Exclusions

- Change requests that are implemented later than 60 weeks with the consent of the CLECs.
- Change requests for which BellSouth has regulatory authority to exceed the interval

### Business Rules

This metric is designed to measure BellSouth's performance in implementing prioritized change requests. The clock starts when a change request has been prioritized as described in the Change Control Process. The clock stops when the change request has been implemented by BellSouth and made available to the CLECs. BellSouth will begin reporting this measure with the next release for diagnostic purposes, and will be measured for SEEM purposes 60 weeks from first prioritization meeting following Commission approval of this measure.

### Calculation

**Percent of Type 5 CLEC initiated Change Requests implemented on time =  $(a \div b) \times 100$**

- a = Total number of prioritized Type 5 CLEC initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 5 CLEC initiated Change Requests from the date of the release prioritization list

**Percent of Type 4 BellSouth initiated Change Requests implemented on time =  $(a \div b) \times 100$**

- a = Total number of prioritized Type 4 BellSouth initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 4 BellSouth initiated Change Requests from the date of the release prioritization list

### Report Structure

- BellSouth Aggregate
- Type 4 requests implemented
- Type 5 requests implemented
- % implemented within 16, 32, 48, and 60 weeks

### Data Retained

- Region
- Report Month
- Total implemented by type
- Total implemented within 60 weeks

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval
• Type 4 requests implemented	• 95% within interval
• Type 5 requests implemented	• 95% within interval

## SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

## SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation		SEEM Analog/Benchmark	
• Region		• 95% within interval	

**BellSouth Telecommunications, Inc.**  
175 East Capitol Street, Suite 790  
Post Office Box 811  
Jackson, MS 39205

thomas.b.alexander@bellsouth.com

**Thomas B. Alexander**  
General Counsel - Mississippi

601 961 1700  
Fax 601 961 2397

August 9, 2002

Via Hand Delivery

Mr. Brian U. Ray  
Executive Secretary  
Mississippi Public Service Commission  
Post Office Box 1174  
2nd Floor, Woolfolk Building  
Jackson, Mississippi

Re: **MPSC Docket No. 97-AD-321: Consideration of the  
Provision of In-Region InterLATA Services By  
BellSouth Telecommunications, Inc. Pursuant to  
Section 271 of TA 96**

Dear Brian:

In connection with the above-referenced proceeding, BellSouth is today filing six (6) new measures that it respectfully requests to be included as part of its previously approved Service Quality Measurement ("SQM") Plan in Mississippi. As information, the Florida Public Service Commission ("FPSC") recently adopted six (6) additional change control measures ("CM"). These measures are as follows:

- CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days
- CM-7: Percent of Change Requests Accepted or Rejected Within 10 Days'
- CM-8: Percent of Change Requests Rejected
- CM-9: Number of Defects in Production Releases (Type 6 CR)
- CM-10: Software Validation
- CM-11: Percent of Change Requests Implemented Within 60 Weeks of Prioritization<sup>1</sup>

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<sup>1</sup> Acceptance of change requests is subject to technical feasibility, cost, and industry standards. See Section 4, Part 2, Types 2-5 Process Flow, Step 3.

Brian U. Ray  
August 9, 2002  
Page 2

As the Commission is aware, several state commissions and the FCC have focused attention upon BellSouth Telecommunications, Inc.'s ("BellSouth") Change Control Process ("CCP"). Consequently, BellSouth will report regional data collected in accordance with these measures in Mississippi in conjunction with its monthly data reporting. BellSouth will begin reporting data on these measures with its August data (reported in September and October).

In conjunction with the new measures, the FPSC ordered BellSouth to pay penalties on measures CM-6, CM-7 and CM-11. Because of the FCC focus on CCP, BellSouth is voluntarily agreeing to pay Tier II penalties on these same three measures (CM-6, CM-7 and CM-11), as set forth in the attached SQM Plan pages, in Mississippi pursuant to the BellSouth SQM Plan and the BellSouth Self-Effectuating Enforcement Mechanism ("SEEM") Plan.

While BellSouth will begin voluntarily implementing these measures as described herein, BellSouth also respectfully requests that the Commission amend the BellSouth SQM Plan to incorporate these six (6) additional measures and the associated penalties. To assist in filing these new SQM Plan pages (pages 11-10 through 11-18), they are to be placed at the end of Section 11 immediately following page 11-9 in the SQM Plan. As necessary, BellSouth will file additional pages to incorporate these new measures into the BellSouth SEEM Plan.

As a result of the above, BellSouth respectfully files the original and fourteen (14) copies of the change control measures recently adopted by the FPSC. An original certificate of service also accompanies this filing. I am also serving a copy of the above documents on Robert G. Waites for the Staff.

An extra copy of the filing is also enclosed. It would be appreciated if you would stamp same as "Filed" and return to me for our records. Finally, by copy of this letter, I am serving all counsel of record with a copy of the above documents.

Brian U. Ray  
August 9, 2002  
Page 3

If you have any questions or wish to discuss, please do not hesitate to call me.

With kindest regards, I remain

Sincerely yours,

A handwritten signature in black ink that reads "Tom Alexander". The signature is written in a cursive, flowing style.

Thomas B. Alexander

TBA/mls

Enclosures

cc: Robert G. Waites, Executive Director, MPUS (w/enclosures)  
George M. Fleming, General Counsel, MPUS (w/enclosures)  
All parties of record (w/enclosures)

#458313

## CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days

### Definition

Measures the percent of Software Errors corrected by BellSouth in X (10, 30,45) business days within the report period.

### Exclusions

- Software Corrections having implementation intervals that are longer than those defined in this measure and agreed upon by the CLECs.

### Business Rules

This metric is designed to measure BellSouth's performance in correcting identified Software Errors within the specified interval. The clock starts when a Software Error is validated per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html), and stops when the error is corrected and notice is posted to the Change Control Website. Software defects are defined as Type 6 Change Requests in the Change Control Process.

### Calculation

**Percent of software Errors Corrected in X (10, 30, 45) Business Days = (a + b) x 100**

- a = Total number of Software Errors corrected where "X" = 10, 30, or 45 business days.
- b = Total number of Software Errors requiring correction where "X" = 10, 30, or 45 business days.

### Report Structure

- Severity 2 = 10 Business Days
- Severity 3 = 30 Business Days
- Severity 4 = 45 Business Days

### Data Retained

- Report Period
- Total Completed
- Total Completed Within X Business Days
- Disputed, Rejected or Reclassified Software Errors

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

### SEEM Measure

SEEM Measure		
	Tier I	
Yes	Tier II	Yes

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval



## CM-7: Percent of Change Requests Accepted or Rejected Within 10 days

### Definition

Measures the percent of Change Requests other than Type 1 or Type 6 Change Requests, submitted by CLECs that are Accepted or Rejected by BellSouth in 10 business days within the report period.

### Exclusions

- Change Requests that are canceled or withdrawn before a response from BellSouth is due.

### Business Rules

The Acceptance/Rejection interval starts when the acknowledgement is due to the CLEC per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html). The clock ends when BellSouth issues an acceptance or rejection notice to the CLEC. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

### Calculation

Percent of Change Requests Accepted or Rejected within 10 Business Days =  $(a \div b) \times 100$

- a = Total number of Change Requests accepted or rejected within 10 business days.
- b = Total number of Change Requests submitted in the reporting period.

### Report Structure

- BellSouth Aggregate

### Data Retained

- Report Period
- Requests Accepted or Rejected
- Total Requests

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

### SEEM Measure

SEEM Measure		
	Tier I	
Yes	Tier II	Yes

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

## CM-8: Percent Change Requests Rejected

### Definition

Measures the percent of Change Requests other than (Type 1 or Type 6 Change Requests) submitted by CLECs that are rejected by reason within the report period.

### Exclusions

- Change Requests that are cancelled or withdrawn by CLEC before a response from BellSouth is due.

### Business Rules

This metric includes any rejected change requests in the reporting period, regardless of whether received early or late. The metric will be disaggregated by major categories of rejections per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html). These reasons are: Cost, Technical Feasibility, and Industry Direction. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

### Calculation

**Percent Change Requests Rejected = (a + b) x 100**

- a = Total number of Change Requests rejected.
- b = Total number of Change Requests submitted within the report period.

### Report Structure

- BellSouth Aggregate
- Cost
- Technical Feasibility
- Industry Direction

### Data Retained

- Report Period
- Requests Rejected
- Total Requests

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> <li>• Region</li> <li>• Reason – Cost</li> <li>• Reason – Technical Feasibility</li> <li>• Reason – Industry Direction</li> </ul>	<ul style="list-style-type: none"> <li>• Diagnostic</li> </ul>

### SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>	<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>

## CM-9: Number of Defects in Production Releases (Type 6 CR)

### Definition

Measures the number of defects in Production Releases. This measure will be presented as the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definition of Type 6 Change Requests (CR) and Severity 1, Severity 2, and Severity 3 defects can be found in the Change Control Process Document.

### Exclusions

None.

### Business Rules

This metric measures the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definitions of Type 6 Change Requests (CR) and Severity 1, 2, and 3 defects can be found in the Change Control Process, which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html).

### Calculation

- The number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, and the number of Type 6 Severity 3 defects.

### Report Structure

- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

### Data Retained

- Region
- Report Period
- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

## SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> <li>Region--Number of Type 6 Severity 1 defects</li> <li>Region--Number of Type 6 Severity 2 defects without a mechanized work around</li> <li>Region--Number of Type 6 Severity 3 defects</li> </ul>	<ul style="list-style-type: none"> <li>0 Defects</li> <li>0 Defects</li> <li>0 Defects</li> </ul>

### SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	•

## CM-10: Software Validation

### Definition

Measures software validation test results for Production Releases of BellSouth Local Interfaces.

### Exclusions

None

### Business Rules

BellSouth maintains a test deck of transactions that are used to validate that functionality in software Production Releases work as designed. Each transaction in the test deck is assigned a weight factor, which is based on the weights that have been assigned to the metrics. Within the software validation metric weight factors will be allocated among transaction types (e.g., Pre-Order, Order Resale, Order UNE, Order UNE-P) and then equally distributed across transactions within the specific type.

BellSouth will begin to execute the software validation test deck within one (1) business day following a Production Release. Test deck transactions will be executed using Production Release software in the CAVE environment. Within seven (7) business days following completion of the Production Release software validation test in CAVE, BellSouth will report the number of test deck transactions that failed. Each failed transaction will be multiplied by the transaction's weight factor.

A transaction is considered failed if the request cannot be submitted or processed, or the results in incorrect or improperly formatted data.

### Calculation

This software validation metric is defined as the ratio of the sum of the weights of failed transactions using Production Release software in CAVE to the sum of the weights of all transaction in the test deck.

- Numerator = Sum of weights of failed transactions
- Denominator = Sum of weights of all transactions in the test deck

### Report Structure

- BellSouth Aggregate

### Data Retained

- Report Period
- Production Release Number
- Test Deck Weights
- % Test Deck Weight Failure

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• ≤ 5%

**SEEM Measure**

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
•	•

## CM-11: Percent of Change Requests Implemented Within 60 weeks of Prioritization

### Definition

Measures whether BellSouth provides CLECs timely implementation of prioritized change requests.

### Exclusions

- Change requests that are implemented later than 60 weeks with the consent of the CLECs.
- Change requests for which BellSouth has regulatory authority to exceed the interval

### Business Rules

This metric is designed to measure BellSouth's performance in implementing prioritized change requests. The clock starts when a change request has been prioritized as described in the Change Control Process. The clock stops when the change request has been implemented by BellSouth and made available to the CLECs. BellSouth will begin reporting this measure with the next release for diagnostic purposes, and will be measured for SEEM purposes 60 weeks from first prioritization meeting following Commission approval of this measure.

### Calculation

Percent of Type 5 CLEC initiated Change Requests implemented on time =  $(a + b) \times 100$

- a = Total number of prioritized Type 5 CLEC initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 5 CLEC initiated Change Requests from the date of the release prioritization list

Percent of Type 4 BellSouth initiated Change Requests implemented on time =  $(a + b) \times 100$

- a = Total number of prioritized Type 4 BellSouth initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 4 BellSouth initiated Change Requests from the date of the release prioritization list

### Report Structure

- BellSouth Aggregate
- Type 4 requests implemented
- Type 5 requests implemented
- % implemented within 16, 32, 48, and 60 weeks

### Data Retained

- Region
- Report Month
- Total implemented by type
- Total implemented within 60 weeks

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval
• Type 4 requests implemented	• 95% within interval
• Type 5 requests implemented	• 95% within interval

**SEEM Measure**

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation		SEEM Analog/Benchmark	
• Region		• 95% within interval	



### **CERTIFICATE OF SERVICE**

I, Thomas B. Alexander, attorney of record for BellSouth Telecommunications, Inc., (“BellSouth”) hereby certify that I have this day caused to be hand-delivered the original and fourteen (14) copies of BellSouth’s Change Control Measures recently adopted by the Florida Public Service Commission to Brian U. Ray, Executive Secretary of the Mississippi Public Service Commission, 2nd Floor, Woolfolk Building, Jackson, Mississippi 39201 and I have also caused to be hand-delivered one copy of same to Robert G. Waites, Executive Director, Mississippi Public Utilities Staff, 3rd Floor, Woolfolk Building, Jackson, Mississippi 39201.

I further certify that I have this day caused to be mailed, by United States mail, postage prepaid, a true and correct copy of same to the following parties who previously intervened in this proceeding:

#### **ATTORNEYS FOR AT&T**

Newt P. Harrison, Esq.  
James L. Halford, Esq.  
Brunini, Grantham, Grower & Hewes, PLLC  
Post Office Drawer 119  
Jackson, Mississippi 39205

William Prescott, Esq.  
Room 8100  
1200 Peachtree Street, N.E.  
Promenade One  
Atlanta, Georgia 30309

**ATTORNEY FOR MS CABLE TELECOMMUNICATIONS  
ASSOCIATION AND THE COMMUNIGROUP COMPANIES**

Raymond G. O'Neal, III, Esq.  
Post Office Box 697  
100 Main Street  
Fulton, Mississippi 38843

**ATTORNEY FOR AMERICAN COMMUNICATIONS SERVICES OF  
JACKSON, INC., DELTACOM, INC., CELLULAR HOLDING, INC.,  
BROOKS FIBER COMMUNICATIONS OF MISSISSIPPI, INC., MCI  
WORLDCOM COMMUNICATIONS, INC., MCI WORLDCOM  
NETWORK SERVICES, INC., SOUTHEASTERN COMPETITIVE  
CARRIERS ASSOCIATION, NEWSOUTH COMMUNICATIONS CORP.,  
ACCESS INTEGRATED NETWORKS, INC., DIXIE-NET  
COMMUNICATIONS, LLC AND KMC TELECOM, INC.**

Stanley Q. Smith, Esq.  
Watkins Ludlum Winter & Stennis  
Post Office Box 427  
Jackson, Mississippi 39205-0427

**ATTORNEY FOR BAY SPRINGS TELEPHONE COMPANY,  
BRUCE TELEPHONE, DECATUR TELEPHONE CO., INC., DELTA  
TELEPHONE COMPANY, INC., FRANKLIN TELEPHONE COMPANY,  
INC., GEORGETOWN TELEPHONE CO., INC., LAKESIDE  
TELEPHONE COMPANY, INC., SLEDGE TELEPHONE COMPANY,  
INC. AND SMITHVILLE TELEPHONE CO., INC.**

Michael D. Simmons, Esq.  
Alan W. Perry, Esq.  
Forman, Perry, Watkins & Krutz  
P. O. Box 22608  
Jackson, MS 39225-2608

**ATTORNEY FOR TIME WARNER ENTERTAINMENT COMPANY, L.P.**

Stephen Platt, Esq.  
217 West Capitol Street  
Suite 105  
Jackson, MS 39201

**MISSISSIPPI ATTORNEY GENERAL**

Frank Spencer, Esq.  
Special Assistant Attorney General  
Post Office Box 22947  
Jackson, MS 39225-2947

**ATTORNEYS FOR SPRINT COMMUNICATIONS COMPANY L.P.**

William R. Atkinson, Esq.  
Attorney, State Regulatory  
Sprint Communications Company L.P.  
Mail Stop GAATLN0802  
3100 Cumberland Circle  
Atlanta, Georgia 30339

Robert P. Wise, Esq.  
Wise Carter Child & Caraway  
Post Office Box 651  
Jackson, Mississippi 39205

**ATTORNEY FOR ASCENT f/k/a TELECOMMUNICATIONS  
RESELLERS ASSOCIATION**

Andrew O. Isar  
Director-State Affairs  
Association of Communications Enterprises  
7901 Skansie Avenue, Suite 240  
Gig Harbor, Washington 98335

**ATTORNEY FOR BROOKS FIBER COMMUNICATIONS OF  
MISSISSIPPI, INC., MCI WORLDCOM COMMUNICATIONS, INC., AND  
MCI WORLDCOM NETWORK SERVICES, INC.**

Kennard Woods, Esq.  
WorldCom, Inc.  
Six Concourse Parkway, Suite 3200  
Atlanta, Georgia 30328

**ATTORNEY FOR SOUTHEASTERN COMPETITIVE CARRIERS  
ASSOCIATION**

Susan J. Berlin, Esq.  
SECCA  
c/o WorldCom, Inc.  
Six Concourse Parkway  
Suite 3200  
Atlanta, GA 30328

**ATTORNEYS FOR BELL SOUTH LONG DISTANCE, INC.**

Harris R. Anthony, Esq.  
BellSouth Long Distance, Inc.  
32 Perimeter Center East  
Atlanta, GA 30346

John C. Henegan, Esq.  
Butler, Snow, O'Mara, Stevens & Cannada  
Post Office Box 22567  
18th Floor, Deposit Guaranty Plaza  
Jackson, MS 39225-2567

**ATTORNEY FOR COMMUNICATIONS WORKERS OF AMERICA**

John L. Quinn, Esq.  
CWA District Counsel  
3516 Covington Highway  
Decatur, GA 30032

**ATTORNEY FOR NEWSOUTH COMMUNICATIONS CORP.**

Lori Reese, Esq.  
Vice President, Governmental Affairs  
NewSouth Communications Corp.  
Two North Main Street  
Greenville, SC 29601

**ATTORNEYS FOR TELEPAK NETWORKS, INC.**

Warren K. Rogers, Jr.  
Charles L. McBride  
Newt P. Harrison  
Brunini, Grantham, Grower & Hewes, PLLC  
P.O. Drawer 119  
Jackson, MS 39205-0119

Steven G. Kraskin, Esq.  
Kraskin, Lesse & Cosson, LLP  
Attorneys at Law  
2120 L Street, NW  
Suite 520  
Washington, DC 20037

**ATTORNEYS FOR KMC TELECOM, INC.**

Andrew M. Klein  
KELLEY DRYE & WARREN, LLP  
1200 19<sup>th</sup> Street, N.W.  
Suite 500  
Washington, D.C. 20036

John D. McLaughlin, Jr.  
Director, State Government Affairs  
KMC Telecom, Inc.  
1755 North Brown Road  
Lawrenceville, GA 30043

This the 9<sup>th</sup> day of August, 2002.

  
THOMAS B. ALEXANDER

#458338

**BellSouth Telecommunications, Inc.**  
**Legal Department**  
1521 BellSouth Plaza  
P. O. Box 30188  
Charlotte, NC 28230

edward.rankin@bellsouth.com

**Edward L. Rankin, III**  
General Counsel-North Carolina

704 417 8833  
Fax 704 417 9389

August 9, 2002

Ms. Geneva S. Thigpen  
Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, NC 27699-4325

Re: Docket No. P-55, Sub 1022

Dear Ms. Thigpen:

Recently, the Florida Public Service Commission adopted 6 additional change control measures. These measures are as follows:

- CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days
- CM-7: Percent of Change Requests Accepted or Rejected Within 10 Days
- CM-8: Percent of Change Requests Rejected
- CM-9: Number of Defects in Production Releases (Type 6 CR)
- CM-10: Software Validation
- CM-11: Percent of Change Requests Implemented Within 60 Weeks of Prioritization<sup>1</sup>

Copies of the SQM pages for these measures are attached to this letter.

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<sup>1</sup> Acceptance of change requests is subject to technical feasibility, cost, and industry standards. *See* Section 4, Part 2, Types 2-5 Process Flow, Step 3.

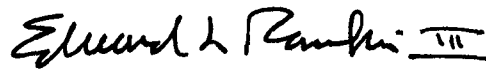
Ms. Geneva S. Thigpen  
Page 2  
August 9, 2002

As the Commission is aware, several state commissions and the FCC have focused attention on BellSouth's CCP process. Consequently, BellSouth will report regional data collected in accordance with these measures in North Carolina in conjunction with its monthly data reporting. BellSouth will begin reporting data on these measures with August data (reported in September and October).

In conjunction with the new measures, the FPSC ordered BellSouth to pay penalties on measures CM-6, CM-7 and CM-11. Because of the FCC's focus on CCP, BellSouth is voluntarily agreeing to pay Tier II penalties on these same three measures (CM-6, CM-7 and CM-11), as set forth in the attached SQM pages, in North Carolina pursuant to the Self-Effectuating Enforcement Mechanism ("SEEM") Plan adopted by the NCUC's May 23, 2002, Notice of Decision in this docket.

While BellSouth will begin voluntarily implementing these measures as described herein, BellSouth also respectfully requests that this Commission amend the performance plan to incorporate these six measures and the associated penalties. Please let me know if you have any questions about the information contained in this letter.

Sincerely,

A handwritten signature in black ink, reading "Edward L. Rankin, III". The signature is written in a cursive style with a horizontal line at the end.

Edward L. Rankin, III

ELR/db  
Enclosures

cc      Parties of Record

## CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days

### Definition

Measures the percent of Software Errors corrected by BellSouth in X (10, 30, 45) business days within the report period.

### Exclusions

- Software Corrections having implementation intervals that are longer than those defined in this measure and agreed upon by the CLECs.

### Business Rules

This metric is designed to measure BellSouth's performance in correcting identified Software Errors within the specified interval. The clock starts when a Software Error is validated per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html), and stops when the error is corrected and notice is posted to the Change Control Website. Software defects are defined as Type 6 Change Requests in the Change Control Process.

### Calculation

Percent of software Errors Corrected in X (10, 30, 45) Business Days =  $(a + b) \times 100$

- a = Total number of Software Errors corrected where "X" = 10, 30, or 45 business days.
- b = Total number of Software Errors requiring correction where "X" = 10, 30, or 45 business days.

### Report Structure

- Severity 2 = 10 Business Days
- Severity 3 = 30 Business Days
- Severity 4 = 45 Business Days

### Data Retained

- Report Period
- Total Completed
- Total Completed Within X Business Days
- Disputed, Rejected or Reclassified Software Errors

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

### SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval



## CM-7: Percent of Change Requests Accepted or Rejected Within 10 days

### Definition

Measures the percent of Change Requests other than Type 1 or Type 6 Change Requests, submitted by CLECs that are Accepted or Rejected by BellSouth in 10 business days within the report period.

### Exclusions

- Change Requests that are canceled or withdrawn before a response from BellSouth is due.

### Business Rules

The Acceptance/Rejection interval starts when the acknowledgement is due to the CLEC per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html). The clock ends when BellSouth issues an acceptance or rejection notice to the CLEC. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

### Calculation

Percent of Change Requests Accepted or Rejected within 10 Business Days =  $(a + b) \times 100$

- a = Total number of Change Requests accepted or rejected within 10 business days.
- b = Total number of Change Requests submitted in the reporting period.

### Report Structure

- BellSouth Aggregate

### Data Retained

- Report Period
- Requests Accepted or Rejected
- Total Requests

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

### SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

## CM-8: Percent Change Requests Rejected

### Definition

Measures the percent of Change Requests other than (Type 1 or Type 6 Change Requests) submitted by CLECs that are rejected by reason within the report period.

### Exclusions

- Change Requests that are cancelled or withdrawn by CLEC before a response from BellSouth is due.

### Business Rules

This metric includes any rejected change requests in the reporting period, regardless of whether received early or late. The metric will be disaggregated by major categories of rejections per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html). These reasons are: Cost, Technical Feasibility, and Industry Direction. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

### Calculation

Percent Change Requests Rejected =  $(a + b) \times 100$

- a = Total number of Change Requests rejected.
- b = Total number of Change Requests submitted within the report period.

### Report Structure

- BellSouth Aggregate
- Cost
- Technical Feasibility
- Industry Direction

### Data Retained

- Report Period
- Requests Rejected
- Total Requests

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> <li>• Region</li> <li>• Reason – Cost</li> <li>• Reason – Technical Feasibility</li> <li>• Reason – Industry Direction</li> </ul>	<ul style="list-style-type: none"> <li>• Diagnostic</li> </ul>

### SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

## CM-9: Number of Defects in Production Releases (Type 6 CR)

### Definition

Measures the number of defects in Production Releases. This measure will be presented as the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definition of Type 6 Change Requests (CR) and Severity 1, Severity 2, and Severity 3 defects can be found in the Change Control Process Document.

### Exclusions

None.

### Business Rules

This metric measures the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definitions of Type 6 Change Requests (CR) and Severity 1, 2, and 3 defects can be found in the Change Control Process, which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html).

### Calculation

- The number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, and the number of Type 6 Severity 3 defects.

### Report Structure

- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

### Data Retained

- Region
- Report Period
- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

## SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> <li>Region--Number of Type 6 Severity 1 defects</li> <li>Region--Number of Type 6 Severity 2 defects without a mechanized work around</li> <li>Region--Number of Type 6 Severity 3 defects</li> </ul>	<ul style="list-style-type: none"> <li>0 Defects</li> <li>0 Defects</li> <li>0 Defects</li> </ul>

## SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	•

## CM-10: Software Validation

### Definition

Measures software validation test results for Production Releases of BellSouth Local Interfaces.

### Exclusions

None

### Business Rules

BellSouth maintains a test deck of transactions that are used to validate that functionality in software Production Releases work as designed. Each transaction in the test deck is assigned a weight factor, which is based on the weights that have been assigned to the metrics. Within the software validation metric weight factors will be allocated among transaction types (e.g., Pre-Order, Order Resale, Order UNE, Order UNE-P) and then equally distributed across transactions within the specific type.

BellSouth will begin to execute the software validation test deck within one (1) business day following a Production Release. Test deck transactions will be executed using Production Release software in the CAVE environment. Within seven (7) business days following completion of the Production Release software validation test in CAVE, BellSouth will report the number of test deck transactions that failed. Each failed transaction will be multiplied by the transaction's weight factor.

A transaction is considered failed if the request cannot be submitted or processed, or the results in incorrect or improperly formatted data.

### Calculation

This software validation metric is defined as the ratio of the sum of the weights of failed transactions using Production Release software in CAVE to the sum of the weights of all transaction in the test deck.

- Numerator = Sum of weights of failed transactions
- Denominator = Sum of weights of all transactions in the test deck

### Report Structure

- BellSouth Aggregate

### Data Retained

- Report Period
- Production Release Number
- Test Deck Weights
- % Test Deck Weight Failure

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• ≤ 5%

**SEEM Measure**

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
•	•

## CM-11: Percent of Change Requests Implemented Within 60 weeks of Prioritization

### Definition

Measures whether BellSouth provides CLECs timely implementation of prioritized change requests.

### Exclusions

- Change requests that are implemented later than 60 weeks with the consent of the CLECs.
- Change requests for which BellSouth has regulatory authority to exceed the interval

### Business Rules

This metric is designed to measure BellSouth's performance in implementing prioritized change requests. The clock starts when a change request has been prioritized as described in the Change Control Process. The clock stops when the change request has been implemented by BellSouth and made available to the CLECs. BellSouth will begin reporting this measure with the next release for diagnostic purposes, and will be measured for SEEM purposes 60 weeks from first prioritization meeting following Commission approval of this measure.

### Calculation

Percent of Type 5 CLEC initiated Change Requests implemented on time =  $(a + b) \times 100$

- a = Total number of prioritized Type 5 CLEC initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 5 CLEC initiated Change Requests from the date of the release prioritization list

Percent of Type 4 BellSouth initiated Change Requests implemented on time =  $(a + b) \times 100$

- a = Total number of prioritized Type 4 BellSouth initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 4 BellSouth initiated Change Requests from the date of the release prioritization list

### Report Structure

- BellSouth Aggregate
- Type 4 requests implemented
- Type 5 requests implemented
- % implemented within 16, 32, 48, and 60 weeks

### Data Retained

- Region
- Report Month
- Total implemented by type
- Total implemented within 60 weeks

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval
• Type 4 requests implemented	• 95% within interval
• Type 5 requests implemented	• 95% within interval

**SEEM Measure**

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval



**BellSouth Telecommunications, Inc.**  
333 Commerce Street  
Suite 2101  
Nashville, TN 37201-3300  
guy.hicks@bellsouth.com

August 9, 2002

**Guy M. Hicks**  
General Counsel  
615 214 6301  
Fax 615 214 7406

Hon. Sara Kyle, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Docket to Establish Generic Performance Measurements, Benchmarks  
and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*  
Docket No. 01-00193

Dear Chairman Kyle:

Recently, the Florida Public Service Commission ("FPSC") adopted 6 additional change control measures. These measures are as follows:

- CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days
- CM-7: Percent of Change Requests Accepted or Rejected Within 10 Days
- CM-8: Percent of Change Requests Rejected
- CM-9: Number of Defects in Production Releases (Type 6 CR)
- CM-10: Software Validation
- CM-11: Percent of Change Requests Implemented Within 60 Weeks of Prioritization<sup>1</sup>

Copies of the SQM pages for these measures are attached to this letter.

As the Authority is aware, several state commissions and the FCC have focused attention on BellSouth's CCP process. Consequently, BellSouth will report regional data collected in accordance with these measures in Tennessee in

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<sup>1</sup> Acceptance of change requests is subject to technical feasibility, cost, and industry standards. See Section 4, Part 2, Types 2-5 Process Flow, Step 3.

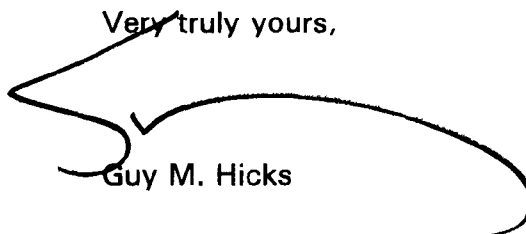
Tennessee Regulatory Authority  
August 9, 2002  
Page 2

conjunction with its monthly data reporting. BellSouth will begin reporting data on these measures with August data (reported in September and October).

In conjunction with the new measures, the FPSC ordered BellSouth to pay penalties on measures CM-6, CM-7 and CM-11. Because of the FCC's focus on CCP, BellSouth is voluntarily agreeing to pay Tier II penalties on these same three measures (CM-6, CM-7 and CM-11), as set forth in the attached SQM pages, in Tennessee pursuant to the Georgia Performance Plan until December 1, 2002 and then pursuant to the Service Quality Measurement Plan and Self-Effectuating Enforcement Mechanism adopted by the FPSC in Docket No. 000121-TP on February 14, 2002.

While BellSouth will begin voluntarily implementing these measures as described herein, BellSouth also respectfully requests that the Authority accept this amendment to the performance plan to incorporate these six measures and the associated penalties. Please let me know if you have any questions about the information contained in this letter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Guy M. Hicks", with a long, sweeping horizontal stroke extending to the right.

GMH:ch

## CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days

### Definition

Measures the percent of Software Errors corrected by BellSouth in X (10, 30, 45) business days within the report period.

### Exclusions

- Software Corrections having implementation intervals that are longer than those defined in this measure and agreed upon by the CLECs.

### Business Rules

This metric is designed to measure BellSouth's performance in correcting identified Software Errors within the specified interval. The clock starts when a Software Error is validated per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html), and stops when the error is corrected and notice is posted to the Change Control Website. Software defects are defined as Type 6 Change Requests in the Change Control Process.

### Calculation

Percent of software Errors Corrected in X (10, 30, 45) Business Days =  $(a + b) \times 100$

- a = Total number of Software Errors corrected where "X" = 10, 30, or 45 business days.
- b = Total number of Software Errors requiring correction where "X" = 10, 30, or 45 business days.

### Report Structure

- Severity 2 = 10 Business Days
- Severity 3 = 30 Business Days
- Severity 4 = 45 Business Days

### Data Retained

- Report Period
- Total Completed
- Total Completed Within X Business Days
- Disputed, Rejected or Reclassified Software Errors

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

### SEEM Measure

SEEM Measure		
	Tier I	
Yes	Tier II	Yes

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

## CM-7: Percent of Change Requests Accepted or Rejected Within 10 days

### Definition

Measures the percent of Change Requests other than Type 1 or Type 6 Change Requests, submitted by CLECs that are Accepted or Rejected by BellSouth in 10 business days within the report period.

### Exclusions

- Change Requests that are canceled or withdrawn before a response from BellSouth is due.

### Business Rules

The Acceptance/Rejection interval starts when the acknowledgement is due to the CLEC per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html). The clock ends when BellSouth issues an acceptance or rejection notice to the CLEC. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

### Calculation

Percent of Change Requests Accepted or Rejected within 10 Business Days =  $(a \div b) \times 100$

- a = Total number of Change Requests accepted or rejected within 10 business days.
- b = Total number of Change Requests submitted in the reporting period.

### Report Structure

- BellSouth Aggregate

### Data Retained

- Report Period
- Requests Accepted or Rejected
- Total Requests

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

### SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

## CM-8: Percent Change Requests Rejected

### Definition

Measures the percent of Change Requests other than (Type 1 or Type 6 Change Requests) submitted by CLECs that are rejected by reason within the report period.

### Exclusions

- Change Requests that are cancelled or withdrawn by CLEC before a response from BellSouth is due.

### Business Rules

This metric includes any rejected change requests in the reporting period, regardless of whether received early or late. The metric will be disaggregated by major categories of rejections per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html). These reasons are: Cost, Technical Feasibility, and Industry Direction. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

### Calculation

$$\text{Percent Change Requests Rejected} = (a \div b) \times 100$$

- a = Total number of Change Requests rejected.
- b = Total number of Change Requests submitted within the report period.

### Report Structure

- BellSouth Aggregate
- Cost
- Technical Feasibility
- Industry Direction

### Data Retained

- Report Period
- Requests Rejected
- Total Requests

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> <li>• Region</li> <li>• Reason -- Cost</li> <li>• Reason -- Technical Feasibility</li> <li>• Reason -- Industry Direction</li> </ul>	<ul style="list-style-type: none"> <li>• Diagnostic</li> </ul>

### SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

## CM-9: Number of Defects in Production Releases (Type 6 CR)

### Definition

Measures the number of defects in Production Releases. This measure will be presented as the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definition of Type 6 Change Requests (CR) and Severity 1, Severity 2, and Severity 3 defects can be found in the Change Control Process Document.

### Exclusions

None.

### Business Rules

This metric measures the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definitions of Type 6 Change Requests (CR) and Severity 1, 2, and 3 defects can be found in the Change Control Process, which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html).

### Calculation

- The number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, and the number of Type 6 Severity 3 defects.

### Report Structure

- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

### Data Retained

- Region
- Report Period
- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region--Number of Type 6 Severity 1 defects	• 0 Defects
• Region--Number of Type 6 Severity 2 defects without a mechanized work around	• 0 Defects
• Region--Number of Type 6 Severity 3 defects	• 0 Defects

### SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	•

## CM-10: Software Validation

### Definition

Measures software validation test results for Production Releases of BellSouth Local Interfaces.

### Exclusions

None

### Business Rules

BellSouth maintains a test deck of transactions that are used to validate that functionality in software Production Releases work as designed. Each transaction in the test deck is assigned a weight factor, which is based on the weights that have been assigned to the metrics. Within the software validation metric weight factors will be allocated among transaction types (e.g., Pre-Order, Order Resale, Order UNE, Order UNE-P) and then equally distributed across transactions within the specific type.

BellSouth will begin to execute the software validation test deck within one (1) business day following a Production Release. Test deck transactions will be executed using Production Release software in the CAVE environment. Within seven (7) business days following completion of the Production Release software validation test in CAVE, BellSouth will report the number of test deck transactions that failed. Each failed transaction will be multiplied by the transaction's weight factor.

A transaction is considered failed if the request cannot be submitted or processed, or the results in incorrect or improperly formatted data.

### Calculation

This software validation metric is defined as the ratio of the sum of the weights of failed transactions using Production Release software in CAVE to the sum of the weights of all transaction in the test deck.

- Numerator = Sum of weights of failed transactions
- Denominator = Sum of weights of all transactions in the test deck

### Report Structure

- BellSouth Aggregate

### Data Retained

- Report Period
- Production Release Number
- Test Deck Weights
- % Test Deck Weight Failure

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• ≤ 5%



**SEEM Measure**

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
•	•

## CM-11: Percent of Change Requests Implemented Within 60 weeks of Prioritization

### Definition

Measures whether BellSouth provides CLECs timely implementation of prioritized change requests.

### Exclusions

- Change requests that are implemented later than 60 weeks with the consent of the CLECs.
- Change requests for which BellSouth has regulatory authority to exceed the interval

### Business Rules

This metric is designed to measure BellSouth's performance in implementing prioritized change requests. The clock starts when a change request has been prioritized as described in the Change Control Process. The clock stops when the change request has been implemented by BellSouth and made available to the CLECs. BellSouth will begin reporting this measure with the next release for diagnostic purposes, and will be measured for SEEM purposes 60 weeks from first prioritization meeting following Commission approval of this measure.

### Calculation

**Percent of Type 5 CLEC initiated Change Requests implemented on time =  $(a + b) \times 100$**

- $a$  = Total number of prioritized Type 5 CLEC initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- $b$  = Total number of prioritized Type 5 CLEC initiated Change Requests from the date of the release prioritization list

**Percent of Type 4 BellSouth initiated Change Requests implemented on time =  $(a + b) \times 100$**

- $a$  = Total number of prioritized Type 4 BellSouth initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- $b$  = Total number of prioritized Type 4 BellSouth initiated Change Requests from the date of the release prioritization list

### Report Structure

- BellSouth Aggregate
- Type 4 requests implemented
- Type 5 requests implemented
- % implemented within 16, 32, 48, and 60 weeks

### Data Retained

- Region
- Report Month
- Total implemented by type
- Total implemented within 60 weeks

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval
• Type 4 requests implemented	• 95% within interval
• Type 5 requests implemented	• 95% within interval

**SEEM Measure**

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation		SEEM Analog/Benchmark	
• Region		• 95% within interval	

**CERTIFICATE OF SERVICE**

I hereby certify that on August 9, 2002, a copy of the foregoing document was served on the following parties, via the method indicated:

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☐ Overnight

James Lamoureux, Esquire  
AT&T  
1200 Peachtree St., NE  
Atlanta, GA 30309

- ☐ Hand  
☒ Mail  
☐ Facsimile  
☐ Overnight

Henry Walker, Esquire  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062

- ☐ Hand  
☒ Mail  
☐ Facsimile  
☐ Overnight

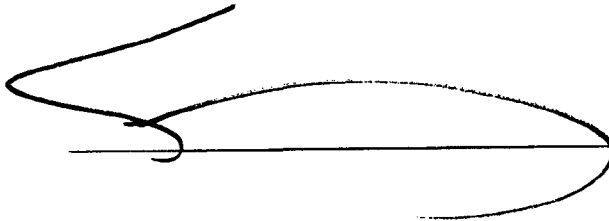
Jon E. Hastings, Esquire  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062

- ☐ Hand  
☒ Mail  
☐ Facsimile  
☐ Overnight

Charles B. Welch, Esquire  
Farris, Mathews, et al.  
618 Church St., #300  
Nashville, TN 37219

- ☐ Hand  
☒ Mail  
☐ Facsimile  
☐ Overnight

Dana Shaffer, Esquire  
XO Communications, Inc.  
105 Malloy Street  
Nashville, TN 37201

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line.